

1       A     No, there wasn't. There wasn't any provision  
2 prohibiting that.

3       Q     Do you recall whether there was any discussion  
4 whatsoever among the persons who became the initial board  
5 members, that is, Paul Crouch, Jane Duff, and Philip David  
6 Espinoza, as to whether any provision should be drafted into  
7 the bylaws reflecting that Translator TV, Inc., was to be  
8 minority-owned or minority-controlled?

9       A     Not to my, not to my knowledge, no. Like I say, I  
10 wasn't present at the organizational meeting.

11       Q     You weren't present but you were the person who had  
12 provided the draft bylaws, correct?

13       A     And, and those were basically organizational form  
14 that would -- it would have required some variation on their  
15 part to put that in.

16       Q     Did you have any discussions with any of the initial  
17 board members, that is, Paul Crouch, Jane Duff, or  
18 Philip David Espinoza, as to the possible number of directors  
19 that the corporation could have?

20       A     No. Again, the bylaws referred to three to, to ten,  
21 and that was just basically a form I used.

22       Q     Did you have any discussion with Philip David  
23 Espinoza as to what the duties were of a director of a  
24 corporation such as Translator TV, Inc.?

25       A     Not that I recall.

1 Q Did you ever have any discussion with Philip David  
2 Espinoza about what the duties of the position chief financial  
3 officer were of Translator TV, Inc.?

4 A Not that I recall.

5 Q Now, I don't, I don't mean to be repetitive here, but  
6 I think this is something that we've gone over a little bit  
7 and I'm only asking it now because it's a lead in for other  
8 questions. And that is, would it be fair to state that when  
9 Translator TV, Inc., was organized its primary goal was to  
10 obtain translators -- And I said primary goal, not only goal,  
11 but primary goal was to obtain translators which were to be  
12 used to broadcast essentially Channel 40, KTVN-TV programming?

13 A To broadcast television programming, including some  
14 local programming, yes.

15 Q Including some local programming?

16 A That was --

17 Q Now, along those lines, I'd like you to refer to Mass  
18 Media Exhibit 27, which is in the, the volume that you have.  
19 The letter that I'm referring you to bears a date of  
20 February 12, 1981, and it's from Joseph E. Dunne, III, to  
21 yourself.

22 A Yes.

23 Q Do you see that?

24 A Yes, I do.

25 Q Now, I'd like you to read to yourself the third and

1 fourth paragraphs.

2 (Pause)

3 A Yes, I read those.

4 Q Now, does this, does this help your recollection in  
5 terms of, of what the initial goals of Translator TV, Inc.,  
6 were in terms of programming?

7 A Yeah, I think it's -- with what I testified to.

8 Q Now, did those initial goals change as a consequence  
9 of the letter that we're referencing here, Mass Media  
10 Exhibit 27?

11 A Well, the letter indicated to me that there was still  
12 a possibility that we would be able to do low power -- do  
13 local programming. And so that was still a goal if the FCC  
14 was to approve it. The hope was still there.

15 Q I see. So that there was, there was the recognition  
16 that in the beginning perhaps only TBN programming could be  
17 broadcast but that there was a possibility that at some point  
18 in the future --

19 A Well --

20 Q -- local programs could be developed?

21 A In 1980, I was under the impression that it was, it  
22 was firm, that we could do it. And then Mr., Mr. Joe Dunne I  
23 believe wrote this letter indicating to me that there were no  
24 applications on file and we were still waiting for rules to be  
25 adopted. And I think we changed the exemption application

1 accordingly.

2 Q Okay. Now, didn't he -- isn't what he's telling you  
3 here that Translator TV, Inc., does in fact have applications  
4 on file with the FCC and that those applications are for  
5 Translator stations and that Translator stations did not have  
6 local origination capacity and that therefore the only  
7 programming that the stations were initially going to have was  
8 what it could receive off of the satellite?

9 A That, that would be the result of, of what was in the  
10 works.

11 Q And so that the only programming that Translator TV,  
12 Inc., was going to broadcast in the beginning was that which  
13 it received from Trinity Broadcasting Network?

14 A That's correct, unless the rules were changed.

15 JUDGE CHACKIN: When we talk about the rules  
16 changing, wasn't there authorization for low power at that  
17 time?

18 MR. SHOOK: Your Honor, it's my understanding that  
19 there was and that these applications just happened to be  
20 Translator applications. That's all.

21 JUDGE CHACKIN: That's why I don't understand why  
22 you're questioning. It wasn't -- The rules weren't changed,  
23 it was the -- The letter specifically says in the third  
24 paragraph that the applications filed by Translator TV did not  
25 request low power stations. They were merely translators.

1 The rules were in existence at that time for low power, the  
2 way you would have local programs, but that was not proposed  
3 by Translator TV.

4 MR. JUGGERT: Well, the sentence I'm referring to is  
5 the one that states "I would suggest that the sentence be  
6 rewritten to read as follows: The FCC is presently  
7 considering the adoption of new rules which would allow the  
8 broadcast of local programming on translators. If such rules  
9 are adopted, Translator TV, Inc., may wish to develop local  
10 programming in several of the locations for which it has  
11 filed."

12 JUDGE CHACHKIN: But the fact of the matter is there  
13 were possibility, if you want the local programming, to file  
14 for low power station. And the rules, as they existed at that  
15 time, which apparently were the applications filed by  
16 Translator TV, did not permit any local programming, only the  
17 carriage of an existing station. Go ahead, Counsel.

18 BY MR. SHOOK:

19 Q Mr. Juggert, I'd like you to refer back to Mass Media  
20 Exhibit 10.

21 A Sure.

22 Q We're going to be in the same volume for a while, so  
23 you don't have to go searching around for notebooks.

24 A Yes, I have it.

25 Q My question to you is did you attend this initial

1 meeting?

2 A No, I didn't.

3 Q Now, I'd like you to turn to Mass Media Exhibit 16.

4 A Yes, I have it.

5 Q Now, from the beginning, were you the keeper of the  
6 corporate minutes, the minute book for Translator TV, Inc.?

7 A I don't believe from the very beginning, and I can't  
8 recall when I assumed that responsibility.

9 Q Would it have been on or about the time this letter  
10 was written, November 10, 1980?

11 A It, it probably would have. I would have ordered a  
12 minute book to get a seal about that time.

13 Q I mean, the reason I ask the question is that if you  
14 look at the second paragraph, where it says, "Please obtain  
15 the necessary signatures and return the documents to me," that  
16 suggests to me that you're the keeper of corporate documents.

17 A That's, that's, that's a good assumption.

18 Q Now, if you would, please, turn to page 9 of that  
19 exhibit.

20 A Yes. The bylaws?

21 Q No. Excuse me, I meant page 9 of Exhibit 16, which  
22 wasn't very clear.

23 A Oh, oh, pardon me. (Pause.) Yes, I have it.

24 Q Now, how did it come about that this power of  
25 attorney was given to you by Paul Crouch?

1       A     Well, that was necessary. I, I use -- I later used  
2     a, a standard IRS form, but the power of attorney is necessary  
3     for the attorney who's working on an exemption application to  
4     be able to receive responses from the IRS that are sent to the  
5     client. And I always do that because the IRS usually puts  
6     time -- very strict time strictures on their demand for a  
7     response, and quite often a client will get a letter and, and  
8     shelve it. But if it comes to me, I know that the red lights  
9     are flashing.

10       Q     All right, I'd like you to turn to paragraph 9 of  
11     your testimony, which is Trinity Broadcasting of Florida  
12     Exhibit 108. It's pages 5 and 6.

13       A     Yes.

14           MR. COHEN: Your Honor, before we -- I'm not clear as  
15     to which portions of that paragraph were admitted and were  
16     excluded. Can you just indulge me and tell me.

17           JUDGE CHACHKIN: I don't have present knowledge of  
18     what --

19           MR. COHEN: Oh. Oh, I see. You --

20           JUDGE CHACHKIN: -- was excluded.

21           MR. SHOOK: I can tell Your Honor. The only thing  
22     that --

23           JUDGE CHACHKIN: The only thing I see is there was  
24     one sentence in the -- page 6.

25           MR. TOPEL: The, the first sentence of paragraph 9

1 and the last sentence of paragraph 9 are in the record. The  
2 remainder of the paragraph is not in the record.

3 MR. COHEN: That's what I thought, but my notes  
4 weren't clear. Thank you.

5 BY MR. SHOOK:

6 Q All right. So for purposes of my question,  
7 Mr. Juggert, the only portions of paragraph 9 that you have to  
8 concern yourself with are the very first sentence, which  
9 begins "Finally" and ends with the word "affiliate." And then  
10 if you turn to page 6, the last sentence. And it's not the  
11 entire last sentence, it's simply the last clause that begins  
12 with the word "I" and then concludes with "TBN."

13 A Yes.

14 Q Have you had a chance to look at this?

15 A Yes, I have.

16 Q Now, was it always your understanding that Translator  
17 TV, Inc./National Minority TV, using those together, had a  
18 different purpose from Trinity Broadcasting Network?

19 A Yes, different. It had a broader purpose.

20 Q So that purpose was something in addition to the  
21 religious purpose that both corporations had?

22 A That's right.

23 Q And it was different from the programming purpose  
24 that both corporations had in the sense of spreading the  
25 gospel through Christian programming?

1       A     That would have been the purpose of National Minority  
2 as well.

3       Q     Right.

4       A     But I would say that, that I anticipated that their  
5 type of programming would differ somewhat from Trinity's.

6       Q     You anticipated that?

7       A     Yes.

8       Q     Was your anticipation -- Did you share your  
9 anticipation in any way with, with anyone else?

10      A     No, I didn't.

11      Q     Now, your understanding of Translator TV, Inc.'s,  
12 purpose of purposes in 1980, would it be correct to say that  
13 that was focused primarily on the operation of, of translators  
14 and perhaps low-power television stations?

15      A     That, that would have been the primary focus, yes.

16      Q     And that there was no purpose in 1980 for Translator  
17 TV, Inc., to operate a full-power television station?

18      A     I don't remember that ever being discussed.

19      Q     In 1984, when certifications were filed with the  
20 Federal Communications Commission -- And let me refer you to  
21 those so that you'll know what I'm talking about. They would  
22 appear in Mass Media Exhibit 72, which is in the second  
23 volume. If you would just take a quick look at those.

24      A     Okay, there's a letter from Colby May and then  
25 certifications.

1 Q Correct. And there are three, three letters and  
2 three certifications. There's a cover letter, then a set of  
3 certifications that appears on the second page. A cover  
4 letter and a set of certifications that appears on the fourth  
5 page, and then a cover letter and a set of certifications that  
6 appears on the sixth page. The certifications are essentially  
7 identical.

8 A Okay.

9 Q Now, my question is in 1984 when these certifications  
10 were filed, wouldn't it be correct the Translator TV, Inc.,  
11 had the same purposes in 1984 as it did in 1980?

12 A To, to my knowledge, that, that's true.

13 Q Now, did the corporation's purposes change in 1986 or  
14 1987?

15 A I remember that somewhere between 1985 and 1987  
16 receiving a memo from Jane Duff on personal stationery of hers  
17 stating that we have just learned -- It had several -- a lot  
18 of information that -- along with other matters. It stated we  
19 have just learned that there is a minority preference for low-  
20 power stations, as I recall, and referring to some minority  
21 preference. And that indicated to me that the -- finally,  
22 this corporation would be able to be operational in a real  
23 sense. Now, I don't know if those minority preferences meant  
24 full-power stations or low-power. I, I can't recall.

25 Q Well, the reference that you, that you gave initially

1 | was that the note from Jane had something to do with the  
2 | preference in the low-power area.

3 |       A     I think that's the case.

4 |       Q     And you recall receiving that sometime between 1985  
5 | and 1987?

6 |       A     Yes.

7 |       Q     Now, with the filing of the certifications that you  
8 | have in front of you that took place in 1984 and the  
9 | subsequent acknowledgement or recognition on the part of Jane  
10 | Duff that some preference is being given by the FCC to an  
11 | entity -- Translator TV, Inc., did you ever have any  
12 | discussions with Jane Duff as to why Translator TV, Inc.,  
13 | never sought to acquire by purchase construction permits or  
14 | licenses for translators in low-power television stations?

15 |       A     No, I didn't.

16 |       Q     Did you have any discussion with anyone as to why  
17 | Translator TV, Inc., did not acquire by purchase any  
18 | construction permits or licenses for low-power television  
19 | stations?

20 |       A     No.

21 |       Q     If I were to ask you -- phrase it in terms of  
22 | translator stations as opposed to low-power stations, did you  
23 | have any discussions?

24 |       A     I just -- I have a vague recollection that, that,  
25 | that up until 1987 the rules were uncertain and that was a

1 contributing factor. That's the only thing that, that goes  
2 through my mind. And my recollection may be faulty, it may  
3 have, may have been at a different time. But as I -- 1987  
4 seems to be a, an important date when, when Translator really  
5 did begin to become active.

6 JUDGE CHACHKIN: I, I think you missed the, the  
7 nature of the question. The question is did you have any  
8 discussions concerning acquiring the stations by purchasing  
9 them.

10 MR. JUGGERT: Translator --

11 JUDGE CHACHKIN: Translators or low powers, rather  
12 than applying for them. Isn't that the -- That's the  
13 question.

14 MR. JUGGERT: Well, no, I had no discussion of that  
15 nature.

16 BY MR. SHOOK:

17 Q Now, I, I put -- My question was put to you in terms  
18 of did you have any discussions. Did you have any  
19 understanding or knowledge as to why Translator TV, Inc., did  
20 not seek to acquire by purchase any translators or low-power  
21 televisions stations between 1980 and 1987?

22 A Other than during -- Part of that period I, I thought  
23 the rules prohibited it.

24 Q But you had no, you had no understanding or knowledge  
25 as to why Translator TV, Inc., did not seek to acquire by

1 purchase any translator or low-power television station  
2 permits or licenses?

3 A No.

4 Q Now, there did come a time during that period,  
5 though, didn't there, when Trinity Broadcasting Network was  
6 purchasing constructions permits and/or licenses for  
7 translators and low-power television stations? And by that  
8 period, I mean 1984 to 1987.

9 A I believe they were, yes.

10 Q And you recall no discussion or no -- Let me put it  
11 this -- You recall no discussion as to why Trinity is making  
12 such purchases, whereas Translator TV, Inc., is not?

13 A No, I don't recall any discussions along that line.

14 Q And you, you had no understanding as to why Trinity  
15 was making such purchases and Translator TV was not?

16 A No, I have no understanding as to why Translator  
17 wasn't doing the same thing.

18 Q Now, I think we've already established through prior  
19 testimony that -- the how, the when, and the why insofar as  
20 you understand it that Jane Duff became a director of Trinity  
21 of Arizona, Trinity of Oklahoma City, and Trinity of Florida.

22 A Yes.

23 Q How did it come to pass that Jane Duff became a board  
24 member of Trinity of Indiana, Trinity of New York, and Trinity  
25 of Seattle?

1       A     She would have been recommended by Paul Crouch for  
2 those positions. And I think it all flowed from his  
3 conversation with the commissioner, former commissioner.

4       Q     That it was good policy or advisable to have a person  
5 such as Jane on, on the board of those companies?

6       A     It was a good policy to, to mentor and to encourage  
7 minorities and women.

8       Q     Now, with that in mind, if it was, if it was good to  
9 mentor her, good to have her on the board, how did it come  
10 about that between 1984 and 1985 Jane Duff left, for whatever  
11 reason, the boards of Trinity Broadcasting Network, Trinity of  
12 Arizona, Trinity of Oklahoma City, Trinity of Florida, Trinity  
13 of Indiana, Trinity of New York, and Trinity of Seattle?

14      A     The, the only explanation I have is what she provided  
15 in her letter of resignation, that it was due to time  
16 commitments.

17      Q     No effort was made to dissuade her?

18      A     Well --

19      Q     To keep her on?

20      A     Not on my part. I don't -- Somebody else may have.

21            JUDGE CHACHKIN: And apparently, no effort was made  
22 to obtain another minority member for any of these boards. Is  
23 that also true?

24            MR. JUGGERT: I think that's true.

25            BY MR. SHOOK:

1 Q And it's your recollection that she left the boards  
2 of the companies that I named on or about the same time?

3 A I, I, I, I'm not certain on that. I can't say for  
4 sure.

5 Q Well, I mean, I'll, I'll tell you that from the, from  
6 the standpoint of our evidentiary record, it's unclear in  
7 terms of two companies, that being Trinity Broadcasting  
8 Network and Trinity Broadcasting of Florida. We actually have  
9 resignation letters and then we have resolutions or actions  
10 filed with respective boards of directors which accept her  
11 resignation. And so my question to you is put in that -- with  
12 that background in mind, that, you know, is it your  
13 recollection or is it your understanding that the resignation  
14 was more or less simultaneous in terms of all of those  
15 companies?

16 A I would be speculating.

17 Q You have no recollection whatsoever?

18 A No. I just remember seeing a, a notice of  
19 resignation from her for Trinity Broadcasting Network, a  
20 letter, a little letter --

21 Q And you never spoke to her about it?

22 A No.

23 Q Did there come a time when Jane Duff was made a  
24 member of the board of Trinity Towers?

25 A She may have.

1 Q Well, I can get the, the board minutes that would  
2 show that she was added. The purpose of my question was --  
3 and you were involved in voting her on, at least the, the  
4 minutes so reflect because you were a board member before and  
5 that she was added to the board. Do you have any recollection  
6 of voting her on the board?

7 A No, I don't.

8 Q Do you have any recollection of how it came about  
9 that she was presented for board membership?

10 A No, no recollection.

11 Q Is it fair to state, though, that in all --

12 JUDGE CHACKIN: Did you finish your response?

13 MR. JUGGERT: Let me go on and just say that's a  
14 Florida corporation and it may have been that because of her,  
15 her connection with Trinity Broadcasting of Florida that she  
16 was put on that corporation, because that's a Florida entity,  
17 Trinity Towers.

18 BY MR. SHOOK:

19 Q Now, wouldn't it be fair to state, though, that  
20 basically you voted her on the board of Trinity Towers because  
21 Paul wanted her on the board?

22 A I wouldn't vote for somebody that wasn't competent.  
23 She was nominated by Paul and was very competent.

24 Q Right. Now, let me, let me make sure that we  
25 understand each other on one thing here, and that is that my

1 questions are not meant to suggest in any way that we have any  
2 question about Mrs. Duff's competence or lack thereof relative  
3 to being added onto the board. We're just, we're just trying  
4 to find out who was involved. And so from that standpoint, it  
5 would be fair to state, wouldn't it, that she was presented  
6 for membership by Paul, Paul Crouch, and that you voted her on  
7 because of that?

8 A And because she was competent.

9 Q I'd like to turn to the 1985 annual meeting of  
10 Trinity and affiliated -- And that appears in Mass Media  
11 Exhibit 91, which is in the second volume. Now, as you can  
12 see from the first page, this concerns an annual meeting of  
13 the combined boards of, of various companies and that this  
14 meeting took place on January 14, 1985.

15 A Yes.

16 Q You'll see a reference to that at the bottom of the  
17 first paragraph. Now, turning to pages 4, 5, and 6, there are  
18 a listing of various companies, and then names of persons  
19 following who are going to be the officers and directors of  
20 those companies.

21 A Yes.

22 Q Now, focusing on the two companies that appear on  
23 page 6 --

24 A Yes.

25 Q -- you'll see that Jane Duff is a vice president and

1 | director of both Trinity Broadcasting of Ciskei and Trinity  
2 | Broadcasting of Nevis, Limited?

3 |       A       Yes.

4 |       Q       Do you have any understanding as to why Jane Duff is  
5 | being made an officer and a director of those companies, but  
6 | is not being made an officer or director of Trinity  
7 | Broadcasting Network or of Arizona, Florida, Oklahoma City,  
8 | Indiana, Denver, New York, Washington, Community Television of  
9 | Texas, and Trinity of Europe? Was any explanation given to  
10 | you or do you have any understanding as to how it's allocated  
11 | that she's an officer and director of the two companies that  
12 | are -- that I just noted and not the ones that I've also  
13 | noted?

14 |       A       Yes, I do.

15 |       Q       And what is that?

16 |       A       Well, both of these companies are foreign  
17 | corporations. Ciskei is a South African corporation and Nevis  
18 | is a West Indies corporation. They're both corporations where  
19 | there is very, very little activity. And we wanted to  
20 | maintain a directorship control here in the U.S. You'll  
21 | notice on both those corporations we have a -- Leonard Sevy  
22 | (phonetic sp.) is a, a South African and Charles Blant  
23 | (phonetic sp.) is a West Indies person. So there really  
24 | wasn't anything to do in those corporations. The activity is  
25 | very, very minimal. The whole purpose there is just to

1 maintain the, the, the directors as people here in the United  
2 States.

3 Q Well, okay. So my question would be then why Jane  
4 Duff and why not Janice Crouch then? If there's so little to  
5 do?

6 A I would say that, that Jane was a person who was  
7 probably more accessible at that time than, than Jan was. Jan  
8 was traveling a great deal. And I think that with respect to  
9 South Africa, part of that was wanting to make a statement,  
10 that we would have a black board member on our South African  
11 corporation. This is back in the times of Apartheid.

12 Q Now, in terms of accessibility, if Jane Duff is more  
13 accessible than Janice Crouch, why would it make sense to have  
14 Janice Crouch on the board of the network, Arizona, Florida,  
15 Oklahoma City, Indiana, Denver, New York, Washington,  
16 Community Television of Texas? Why would it make sense to  
17 have her on those boards which apparently are more active?

18 A Because on those corporations, quite frequently she  
19 gives a proxy to, to her husband Paul Crouch.

20 Q Isn't it not only quite frequently, but basically all  
21 the time?

22 A No. I would say the majority of the time would be  
23 correct, but not all the time.

24 Q All right. Now, how much of a majority would that  
25 be? Are we talking about 80 to 90 percent of the time?

1       A       I would, I would say 75 to 80.

2       Q       Now, I'd like you to turn your attention to Mass  
3 Media Exhibit 57, which is in the first volume.

4       A       I have it.

5       Q       Now, you see that these minutes are for May 27, 1983,  
6 and that one of the two things that are happening is that Jan  
7 Crouch is being added to the board of directors.

8       A       Yes.

9       Q       You see that? And the way the minutes are written --  
10 And they're written by you, right?

11      A       Yes, they are.

12      Q       It was moved by yourself and seconded by Mrs. Duff  
13 that Jan Crouch be added to the board of directors. Can you  
14 tell us what it is that triggered your moving on this  
15 particular day to add Jan Crouch to the board of directors?

16      A       As I indicate here, the -- my understanding of it was  
17 to protect the Crouch Family's continued participation in  
18 Trinity Broadcasting Network.

19      Q       What is happening, if anything, in May 1983 that  
20 would suddenly -- I mean, we're talking about a special  
21 meeting that's being called at 2:30 in the afternoon for the  
22 purpose -- at least one of the purposes is to add Jan Crouch  
23 to the board. What is happening during this period of time  
24 that warrants calling a special meeting to add Jan Crouch to  
25 the board?

1       A     Counsel, let's cut to the quick. I was informed this  
2 week, first time in my life, that there was some rule passed  
3 by the FCC on this particular day or the day before, I'm not,  
4 not sure when, and that, that somehow it's being construed  
5 that this meeting had something to do with that. Absolutely  
6 not. It was not a consideration. I knew nothing of any, any  
7 kind of a rule change. Nobody at the board mentioned anything  
8 about it. The first time I ever heard of it was this, this  
9 week. It was just -- As I said, counsel, counsel informed me  
10 that it had happened on this day or the day before, but it  
11 didn't -- it was not in, in -- never discussed, never  
12 mentioned to me by Paul Crouch, never mentioned to me by Jane  
13 or, or anyone else. I think it was just a coincidence.

14       Q     I appreciate that. What I'm, what I'm thinking of or  
15 what I'm, what I'm trying to find out here is that the minutes  
16 reflect that you moved to add Jan to the board.

17       A     Yes.

18       Q     And what I'm trying to ascertain from you is whether  
19 this was something you thought of all by yourself or whether  
20 this was something that was put to you and then you just  
21 happened to be the person who moved to add Jan to the board.

22       A     It, it would have been recommended. Paul, Paul, Paul  
23 raised the issue of adding Jan. And it would have been well  
24 before this meeting that he would have raised that issue.

25       Q     Well, and that's why it's certainly curious to me,

1 | because if such a recommendation had been made well beforehand  
2 | and there was some concern about protecting the Crouch Family,  
3 | what is, what is going on that warrants calling a special  
4 | meeting for that purpose?

5 |       A     The, the meeting was not noticed. The meeting --  
6 | These meetings are always scheduled at the convenience of all  
7 | concerned, and to get these -- this group of people together  
8 | is not an easy task. I, I operate an independent law  
9 | practice. I have a number of clients and I'm quite often out  
10 | of town. So this -- There was no urgency in this meeting, it  
11 | was just a matter of housecleaning that we wanted to take care  
12 | of.

13 |       Q     So you had to travel from your law firm to Trinity  
14 | offices in order for this meeting to occur?

15 |       A     I had to --

16 |       Q     Is that what's happening here?

17 |       A     I had to have my schedule arranged such, it occurred  
18 | at 2:30 in the afternoon, that I would have, have an afternoon  
19 | free when I can go over to the Trinity offices, which are,  
20 | say, 20 to 30 miles from my office, and attend the, the board  
21 | meeting, which I do for free.

22 |       Q     Where? It's 20 miles from your office to --

23 |       A     Yes, in Costa Mesa over to Tustin.

24 |       Q     So is your recollection that this was a planned  
25 | meeting of some kind?

1       A     My recollection was that we were -- we, we scheduled  
2 a meeting at which time any business at all that we had could  
3 be brought up. But the specific purpose -- the specific thing  
4 we wanted to accomplish was to put Jan on the, on the board.

5       Q     All right. Now, I'd like to explore with you the  
6 rationale for doing that. What is going to be accomplished by  
7 adding Jan Crouch to the board? And in asking that question,  
8 one of the things that I'd like you to do -- Or in answering  
9 that question, one of the things I'd like you to do is refer  
10 to Mass Media Exhibit 58, which is a revocable proxy given by  
11 Jan to Paul.

12       A     Yes.

13       Q     It's not dated, so we don't know with certainty when  
14 this, when this proxy was given. But what is, what is going  
15 to be accomplished by adding Janice Crouch to the board of  
16 Trinity Broadcasting Network?

17       A     Janice Crouch would, would have the, the right to  
18 attend board meetings, to, to vote, to, to be informed, to  
19 receive minutes. If -- At the present time, I'm subject to  
20 being thrown out if I was to become a, a, a factor that was  
21 working to the detriment of Trinity. With Jan on the board, I  
22 could be thrown out at this particular time. Jane Duff could  
23 have been asked to leave the board. It really was one that  
24 provided for the possibility of control, whether it was ever  
25 exercised or not, on the part of, of the Crouch Family. Or at

1 | least they could block an untoward moves that, that Jane and I  
2 | would want to make.

3 |       Q     So this was viewed as a protection, an additional  
4 | protection for Paul Crouch along the lines of the change in  
5 | the bylaws which protected him as president of Trinity?

6 |       A     Protection for the Crouch Family. I think one of the  
7 | concerns was if Paul died in any airplane crash, Jane and I  
8 | would be the board members. The Crouch Family wouldn't be on  
9 | the board.

10 |       Q     Well, let's explore that a little bit. If Paul dies  
11 | in a plane crash and the board -- Let's say he died in a plane  
12 | crash the next day, May 28th, 1983, and it's you, Jane Duff,  
13 | and Janice Crouch on the board. What is it that prevents you  
14 | from voting off Janice Crouch at that point in time?

15 |       A     The, the consensus of the Christian Community, the  
16 | donors, those who, who support Trinity, it would -- there  
17 | would be a large group of people, pastors in the area, that  
18 | would rise up in arms if we were to, to attempt to take over,  
19 | two people like Jan and myself. I mean like Jane and myself.  
20 | Let me go on. If you look at the bylaws, particularly the  
21 | protective clause or just the bylaws in general, when it  
22 | speaks in terms of the vice president, which Jan is, the vice  
23 | president assumes all of the, the rights of the, of the  
24 | president.

25 |               And I would include that in that, in my mind, is the

1 right to be protected from being removed from the board unless  
2 you went through that for cause provision. She was eventually  
3 added and she was eventually made, made vice president.

4 Q She was eventually made vice president, but she  
5 wasn't made vice president at this meeting?

6 A I'm not sure if she was. I don't think she was at  
7 this time.

8 Q Well, let's look at the minutes for the 1984 annual  
9 meeting, which would have taken place some seven to eight  
10 months later. And that would be in Mass Media Exhibit  
11 Number 70, I believe.

12 A That's Number 3?

13 MR. EMMONS: Volume III.

14 BY MR. SHOOK:

15 Q It's in the second volume. Now, this meeting, if you  
16 look at the first page, took place on January 20, 1984. See  
17 that?

18 A Yes, I do.

19 Q And if you go to page 10, I believe that's your  
20 signature, signing as secretary of the -- at least the board  
21 of Trinity Broadcasting Network?

22 A Yes, that's right.

23 Q Now, first of all, turn to the second page, the first  
24 full paragraph that appears on the second page.

25 A Yes.